



PRESIDENT'S OFFICE

THE CENTRAL LIBRARY AT COPLEY SQUARE | BOSTON PUBLIC LIBRARY

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Federal Communications Commission
Washington, D.C. 20554

06/23/2017

To whom it may Concern,

Please accept the enclosed Petition of Waiver of FCC Form 471 Filing Deadline, on behalf of the Boston Public Library & the Metro Boston Library Network, (BEN 149096), within the Schools and Libraries Universal Service Support Mechanism.

Sincerely,

David Leonard

President, Boston Public Library

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Petition of Waiver of FCC Form 471 Filing
Deadline

Boston Public Library/ MBLN
(BEN 149096)

Schools and Libraries Universal Service Support
Mechanism

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CC Docket No. 02-6

**Request for Waiver
FCC Form 471 Filing Deadline for Funding Year 2017
RE: 471 application numbers 171049219 and 171049218**

I. Summary of Request:

Boston Public Library/ MBLN (149096) respectfully petitions the Commission to request a waiver of the Funding Year 2017 FCC Form 471 filing deadline to allow the Out of Window submission of their E-Rate Funding Year 2017 FCC Form 471 171049219 and 171049218, due to unexpected delays. Loss of high speed internet service would drastically impact the lives of the people of Boston, who rely on the Boston Public Library for reliable internet service.

II. Details of Request:

Boston Public Library/ MBLN (149096) submitted a 470 on 12/15/16. After the 28 day window, we followed Massachusetts State and City of Boston procurement rules and regulations and put out two invitations to bid: layer 2 connectivity from our disaster recovery site to our central site, and layer 3 connectivity from our central site to our branches. This invitation to bid was based solely on price. The responses we received were not sufficient to allow us to make a recommendation solely on price. We therefore determined it would be most responsible and consistent with USAC bid evaluation guidelines to conduct a qualifications based selection through a City of Boston Request for Proposal, which would

allow us to better evaluate the responses. To ensure that we were staying within USAC guidelines, we called USAC on 3/30/2017, and were advised that we did not need to submit a new 470 in order to proceed with the new procurement.

On 4/14/2017 we called USAC again and were advised that we did in fact have to file a new 470 as we were making "cardinal changes" to the original 470. Had we understood this on 3/30, we would have filed a new 470 with a qualifications based selection through a request for proposals, and therefore still made our 471 filing in-window. Unfortunately, by 4/14/2017, that option was closed to us.

As a long time participant of the E-rate program, Boston Public Library/MBLN has never had to file a waiver for a 471 out-of-window before. It is our intention that this be a onetime request and we hope that our long history of compliance will provide sufficient assurance that this is a reasonable expectation.

E-Rate is vital to helping us assist our patrons, as it allows us to provide the people of Boston with a free source for high speed internet connection. Our patrons rely on our Wi-Fi and computer workstations to find work, build their businesses, and build their job skills. We rely on E-rate to make internet service affordable. In funding year 16, we have provided over half a million WIFI sessions and well over half a million computer terminal sessions. Your approval of this waiver will allow us to continue this important work

Respectfully submitted.



David Leonard
President, Boston Public Library

6/23/17